



UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
	Honorable Aleta A. Trauger
Plaintiff, )	
vs. )	PLAINTIFF'S OMNIBUS MOTION TO
	FILE UNDER SEAL
CORRECTIONS CORPORATION OF )	
AMERICA, et al., )	
Defendants. )	

Pursuant to Rules 5.03 and 7.01 of the Civil Local Rules of Court ("L.R.") and Administrative Order No. 167-1: Administrative Practices and Procedures for Electronic Case Filing §5.07, Plaintiff<sup>1</sup> hereby moves the Court for leave to file under seal unredacted versions of the Reply in Support of Plaintiff's Motion to Exclude Opinion Testimony of Defendants' Non-retained Experts William Dalius, Harley Lappin, Don Murray and Kim White; and the Reply in Support of Plaintiff's Motion to Exclude Expert Testimony of Justin Marlowe (the "Replies"), as well as the Declaration of Christopher M. Wood in Support of Reply in Support of Plaintiff's Motion to Exclude Opinion Testimony of Defendants' Non-retained Experts William Dalius, Harley Lappin, Don Murray and Kim White; and the Declaration of Willow E. Radcliffe in Support of Reply in Support of Plaintiff's Motion to Exclude Expert Testimony of Justin Marlowe and the exhibits thereto (the "Declarations"), which are being filed contemporaneously herewith as "Sealed Documents."<sup>2</sup>

<sup>1</sup> "Plaintiff" is Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund. "Defendants" are Corrections Corporation of America ("CCA") and certain of its executives. Following the filing of this action, Defendants rebranded CCA and now refer to it as CoreCivic.

<sup>2</sup> The Replies and Declarations contain information that Defendants have designated as "Confidential." Plaintiff respectfully submits that filing redacted versions of the Replies and Declarations is impracticable.